

Hon. John C. Coughenour
Noting Date: December 28, 2015 at 6:30 PM

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERALD LESAN,

Defendant.

NO. 2:15-CR-387-JCC

DEFENDANT'S MOTION TO
REOPEN DETENTION

COMES NOW Gerald Lesan, Defendant in the above entitled matter, and requests the trial Court to reopen detention hearing in this cause.

This motion is based upon the accompanying declaration of Mr. Lesan's lawyer, below:

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DEFENDANT'S MOTION TO REOPEN DETENTION
HEARING- 1

The Crowley Law Firm, P.L.L.C.

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DECLARATION OF JOHN R. CROWLEY

1. My name is John Crowley and I am the lawyer for Gerald Lesan in the above captioned cause.
2. On December 2, 2105, Chief Magistrate James P. Donohue conducted a detention hearing on the above captioned cause. Judge Donohue ordered the defendant to be detained. In part, Judge Donohue indicated that a significant issue causing him to deny release was the fact that defendant Leason lived close to a grade school. The Court also indicated that if the USPO later approved housing for Mr. Leason, the court would consider such an approval as a significant change in circumstance justifying a reopening of the detention hearing on the above captioned cause.
3. Sometime after December 9, 2015, such an approval for housing of Mr. Leason was made by assigned U.S. Probation officer Ben Beetham. Counsel for Mr. Leason believes that this approval of housing for Mr. Leason constitutes the “changed circumstance” referenced by Hon. James P. Donohue on December 2, 2015.

1 4. Because of this changed circumstance, counsel for Mr. Leason now
2 moves the magistrate Court to reopen the detention hearing on the
3 above captioned cause.

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5 Respectfully submitted this 28th day of December, 2015.

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7 /s/ John R. Crowley
8 John R. Crowley, ESQ.,
9 WSBA# 19868
10 Counsel for Mr. Bridges
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NOTICE OF ELECTRONIC SERVICE

I hereby certify that on December 28, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Clerk of the United States District Court and Assistant United States Attorney, Western District of Washington. On this same date, a copy of the attached document was mailed to the defendant in the above-captioned cause.

/s/ Jason Morgensen

Jason Morgensen, Paralegal
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